

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
	)	No. 13 CR 685-1
v.	)	
	)	Judge John J. Tharp, Jr.
DIKE AJIRI	)	

**AGREED MOTION FOR AN ORDER DIRECTING TRANSFER OF FUNDS**

The United States of America, by Zachary T. Fardon, United States Attorney for the Northern District of Illinois moves this court for entry of an order applying the bond money on deposit to defendant's outstanding monetary obligations, and in support states as follows:

1. On August 29, 2013, defendant Dike Ajiri executed a bond appearance form in the amount of \$3,000,000. As a condition of the bond, defendant agreed to have certain property and funds restrained by court order.

2. An order was entered by Magistrate Judge Rowland restraining funds at Charles Schwab. Dkt. 16 (8/29/13 order restraining \$1.5 million held at Chas. Schwab). The August 2013 order was then modified by Magistrate Judge Rowland to allow the transfer of funds from the Schwab Account to an account at TD Ameritrade bearing account number XXX-XXX593 and controlled by DRJ Holdings Limited Partner A Partnership and to restraint that account. Dkt. 67 (12/17/14 order restraining an uncertain amount at TD Ameritrade). As of May 12, 2016, the funds under restraint at TD Ameritrade total \$619,255.91 plus interest.

3. On October 25, 2015, defendant pled guilty to Count One of the indictment. In the plea, defendant agreed "to assist and not oppose efforts by the government to transfer the full amount of the funds held in the TD Ameritrade account bearing account number XXX-XXX593

to the Clerk of the U.S. District Court so that such funds can be applied towards restitution.”  
Dkt. 83, Plea Agreement, ¶ 15.

4. The government sent defense counsel an earlier version of this motion, and defense counsel said that he had no objection.

WHEREFORE, the United States requests that the Court enter an order directing TD Ameritrade to turn over to the Clerk of the United States District Court the entirety of the funds under restraint for application to the defendant’s restitution.

Respectfully submitted,

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United States Attorney

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Dated: May 17, 2016